

James E. Patterson, Esq.
McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP
1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962-2075
(973) 993-8100
Attorneys for Defendants
The Real Real, Inc., and Julie Wainwright

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CECILE HAHN,

plaintiff,

vs.

THE REAL REAL, INC., and JULIE
WAINWRIGHT,

Defendants.

Civil Action No. 2:18-cv-5030
(KM)(MAH)

**DEFENDANTS' NOTICE OF
MOTION FOR SUMMARY
JUDGMENT**

Motion Returnable: March 15, 2021

TO: Paul Castronovo, Esq.
Castronovo & McKinney, LLC
71 Maple Avenue
Morristown, New Jersey 07960
Attorney for Plaintiff

COUNSEL:

PLEASE TAKE NOTICE that on March 15, 2021, or as soon thereafter as counsel may be heard, Defendants, The Real Real, Inc., and Julie Wainwright ("Defendants") shall move, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and Local Civil Rule 56.1, through their undersigned attorneys, before the Honorable Kevin McNulty, United States District Judge of the United States District Court for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order of Summary Judgment dismissing Plaintiff Cecile Hahn's Complaint in its entirety, and with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants rely upon their Memorandum of Law, Statement of Undisputed Material Facts Pursuant to Fed. R. Civ. P. 56 and Local Civil Rule 56.1, and the Declaration of James E. Patterson, filed herewith. A proposed form of Order is also submitted.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys for Defendants respectfully requests oral argument on this motion.

McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP
Attorneys for Defendants

By: /s/ James E. Patterson
James E. Patterson

Dated: February 16, 2021